

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**GEORGE COLLINS AND ALRIKA COLLINS,)
Plaintiffs,)
v.) Case No. 22-cv-00318-Raw-JA
STATE FARM FIRE AND CASUALTY)
COMPANY,)
Defendant.)**

**MOTION TO QUASH OR MODIFY SUBPOENA TO PRODUCE DOCUMENTS,
INFORMATION OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A
CIVIL ACTION**

Ian's Enterprise, LLC ("IE") objects to the Subpoena (copy attached hereto as Exhibit "1") served upon it by Defendant in the above-styled action, and moves pursuant to Rule 45(d)(1), 45(d)(3)(A)(1), and 45(d)(3)(A)(iv) to quash the Subpoena. Alternative, IE requests that the Subpoena be modified as requested below.

IE was served with the Subpoena on May 22, 2023, giving it only eleven (11) days to produce documents requested in the Subpoena. IE requires no less than thirty (30) days to produce the documents requested in the Subpoena, due to having to search multiple systems and coordinate with counsel as needed. Further, the Subpoena creates an undue hardship on IE due to the cost involved in producing documents in response to the Subpoena. IE requests the Court enter an Order requiring Defendant to provide payment to IE in the amount of \$1.00 per page, plus \$.25 per printed page as a reasonable cost for the retrieval and production of records requested in the Subpoena. IE's files are generally thousands of pages and IE cannot accurately know a page count without searching and retrieving records.

Further, to the extent that the *Stipulated Protective Order* [Doc. 31] filed on April 26, 2023, is not intended to extend to IE and the documents to be produced by it, IE requests that the documents produced by it be kept confidential pursuant to the terms of the *Stipulated Protective Order*.

WHEREFORE, Ian's Enterprise, LLC, requests this Court enter an Order quashing the Subpoena issued to it, or alternatively, modifying the Subpoena as requested herein, that the Court enter an order requiring that the documents to be produced by Ian's Enterprise, LLC be kept confidential pursuant to the terms of the *Stipulated Protective Order*, and for such other relief as the Court deems equitable.

Respectfully submitted,

/s/ Amanda R. Blackwood
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**ATTORNEY FOR IAN'S ENTERPRISE,
LLC**

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2023, a true and correct copy of this document was electronically served using the CM/ECF system to:

Andrew Brown
Terry McKeever

And all other parties registered to receive ECF notices in this case.

/s/ Amanda R. Blackwood